

Exhibit B

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

ORANGEBOY, INC.,

Plaintiff,

v.

PATRON POINT, INC.,
Ohio Registered Agent Service, LLC
6545 Market Ave. North, #100
North Canton, OH 44721

and

DOES #1–5,

Defendants.

Case No. _____

Judge _____

DECLARATION OF CHRISTOPHER KELBLEY

1. I, Christopher Kelbley, am over the age of 18, am not under any disability, and am competent to testify to the facts stated below based on my personal knowledge.

2. I am the Chief Technology Officer of OrangeBoy, Inc. Among other things, I manage the daily software design, development, and testing efforts for OrangeBoy’s software platform, Savannah. I am also responsible for ensuring the technical security of Savannah and the client data that it uses.

3. Savannah is a web-based “Software as a Service” platform, and so it is not installed on users’ computers like traditional software was. Instead, users access Savannah through the Internet and a standard web browser. OrangeBoy partners with Microsoft to operate the servers in the United States and Canada that securely host Savannah, including its back-end functionality and client databases.

4. OrangeBoy takes security very seriously. Savannah includes information that our clients consider proprietary and confidential, including operations data and certain information about their own cardholders and customers. Currently, OrangeBoy securely stores information associated with more than 35 million library cardholders across North America.

5. In addition to working with Microsoft to host Savannah, which ensures that we gain the benefit of Microsoft's size and security expertise, OrangeBoy has taken a number of steps to ensure that its systems are secure and that its users' data remains safe and confidential. We store user data in independent, secure databases, anonymizing or pseudonymizing it wherever possible and ensuring that all transfers are made securely. We provide clients with a two-factor authentication scheme as well as password-based authentication to ensure that only authorized users are given access to Savannah and to client data. And we regularly monitor our systems for vulnerabilities and attacks.

6. On June 2, 2020, OrangeBoy detected an attempted attack on its system. That afternoon, someone used Savannah's "Forgot Password" page to try to reset the Savannah passwords for several OrangeBoy email addresses, including the company's President, Sandy Swanson.

7. Even though the person did not succeed in guessing any passwords and did not gain access to Savannah, we investigated the attack.

8. Part of our investigation involved tracing the attacker's IP address. Internet Protocol addresses, also known as IP addresses, are unique numbers assigned to each device connected to a computer network, such as the Internet. They are used to identify computers on a network and to route communications to the correct recipients. Although sophisticated attackers often hide their true IP address by routing their actions through various third parties, in certain

situations IP addresses can be traced back to particular persons or computers, or to certain parts of the world.

9. Here, we determined that the IP address of the person who tried to reset OrangeBoy's passwords originated from Johnstone, Scotland, a town near Glasgow.

10. We later performed an exhaustive search of our activity logs to see if this IP address appeared elsewhere. One entry came up, showing that on January 17, 2020, the same Scotland-based IP address had tried to log into Savannah using the email address "scott.euan.downie@gmail.com."

11. This caught my attention, because I knew that Patron Point had recently hired a new Vice President of Growth named Ian Downie, whose LinkedIn page listed Glasgow, Scotland as his home.

12. On July 29 and 30, 2020, OrangeBoy detected another attack on our system. This attack was more serious than the first. It had three parts.

13. First, someone initiated an email subscription bomb against five OrangeBoy email addresses. An "email bomb" is a type of "denial of service" attack that sends an extremely large number of messages to an email address. They are meant to overwhelm the victim's email system by flooding it with more messages than it can handle, slowing down email delivery if not making the victim's email service completely unusable.

14. In this case, the OrangeBoy email addresses were almost simultaneously signed up for over 10,000 email subscription lists. Although OrangeBoy's email system was able to handle the subscription bomb without shutting down entirely, the attack still negatively affected the system while it was ongoing, and the affected email accounts were flooded with unwanted

email messages. This is another goal of email bombs, which can hide suspicious activity by burying an important email in a flood of unimportant messages.

15. This appears to have been at least part of the attacker's goal here, because shortly after the email subscription bomb began, a user began trying to guess and/or reset Savannah passwords for several usernames associated with OrangeBoy's clients. As with the first attack, none of these attempts succeeded, and the attacker never gained access to Savannah.

16. I later learned that around the same time as these first two attacks, someone pretending to be a potential client filled out the information request form on OrangeBoy's web site, asking for information about how Savannah processed email messages to cardholders. OrangeBoy's Sales Manager tried to answer the person's questions but later became suspicious that the person was not who they claimed to be.

17. When we began investigating these three matters, we discovered that the same IP address, 209.58.142.156, was the source of them all.

18. We also discovered that shortly before the attacks began on July 29, OrangeBoy's web site had been visited by IP addresses that traced back to Wilmslow, England, and to Johnstone, Scotland. These visitors seemed odd to me, because OrangeBoy does not provide services to libraries in the United Kingdom, does not market Savannah in the United Kingdom, and based on past web site traffic, gets relatively few visitors from the United Kingdom. More importantly, both locations appeared to be connected to Patron Point employees. I knew from our earlier investigation that Patron Point's Vice President of Growth, Ian Downie, lives near Johnstone, Scotland, and I now learned that Patron Point's Business Development Director, Nigel Wheeldon, listed his location on LinkedIn as Wilmslow, England.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: 08-20-2020

Christopher W. Kelbley
Christopher Kelbley